Michael J. Frevola
Lissa D. Schaupp
HOLLAND & KNIGHT LLP
195 Broadway
New York, NY 10007-3189
(212) 513-3200

ATTORNEYS FOR PLAINTIFFS
DEX SERV LIMITED and ALLIANZ GLOBAL
CORPORATE & SPECIALTY AG f/k/a ALLIANZ
MARINE AND AVIATION VERSICHERUNGS AG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEX SERV LIMITED and ALLIANZ GLOBAL CORPORATE & SPECIALTY AG f/k/a ALLIANZ MARINE AND AVIATION VERSICHERUNGS AG,	07 Civ. 9301 (LAK)
Plaintiffs,	**AFFIDAVIT IN SUPPORT OF AMENDED ORDER OF ATTACHMENT**
-against-	
GOLTENS SHANGHAI CO., LTD. and SHANGHAI GOLTENS MARINE MACHINERY & MAINTENANCE CO., LTD.,	
Defendants.	

STATE OF NEW YORK   )
) ss:
COUNTY OF NEW YORK   )

Michael J. Frevola, being duly sworn, deposes and says:

1.   I am a member of the firm of Holland & Knight LLP, attorneys for plaintiffs Dex

Serv Limited and Allianz Global Corporate & Specialty AG f/k/a Allianz Marine and Aviation

Versicherungs AG, and I am duly admitted to practice before the United States District Court for the Southern District of New York.

2.   I am familiar with the facts and circumstances underlying this dispute and I am submitting this affidavit in support of the Verified Amended Complaint and the Amended Writ of Attachment.

3.   Defendants Goltens Shanghai Co., Ltd. ("Goltens Shanghai") and Shanghai Goltens Marine Machinery & Maintenance Co., Ltd. ("Goltens Marine") are not listed in the telephone directory of the principal metropolitan areas in this district, nor are they listed in the Transportation Tickler, a recognized commercial directory in the maritime industry.

4.   Our office contacted the Secretary of State for the State of New York and was advised that defendants Gotlens Shanghai and Goltens Marine are not New York business entites, nor are they foreign business entities authorized to do business in New York.

5.   To the best of my information and belief, defendants Goltens Shanghai and Goltens Marine cannot be found within this district or within the State of New York.

6.   The Verified Complaint erroneously stated a claim in the amount of $331,169.45. This amount only took into account 50% of the subrogated claim, as each of the two plaintiffs has an identical claim for the identical amount. Plaintiffs' Verified Amended Complaint corrects this error and states the correct amount. Based upon the facts set forth in the Verified Amended Complaint, I respectfully submit that the defendants Goltens Shanghai and Goltens Marine are liable to Plaintiff for the damages alleged in the Verified Amended Complaint, which amounts, as best as can be presently determined, amount to a total of US$662,338.89.

2

7.   Upon information and belief, defendants Goltens Shanghai and Goltens Marine have property, goods, chattels or effects within this jurisdiction, to wit: funds or accounts held in the names of Goltens Shanghai Co., Ltd. and/or Shanghai Goltens Marine Machinery & Maintenance Co., Ltd. at one or more of the following financial institutions:

Bank of America, N.A.

Bank of China

The Bank of New York

Citibank, N.A.

Deutsche Bank Trust Company Americas

HSBC Bank USA, N.A.

JPMorgan Chase Bank, N.A.

UBS AG

Wachovia Bank, N.A.

Société Générale

Standard Chartered Bank

BNP Paribas

Calyon Investment Bank

American Express Bank

Commerzbank

ABN Amro Bank

Bank Leumi USA

Banco Popular

Bank of Tokyo-Mitsubishi UFJ Ltd.

China Trust Bank

Great Eastern Bank

Industrial Bank of Korea

Nara Bank

Shin Han Bank

United Orient Bank

8.   Plaintiffs are, therefore, requesting that this Court, pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, issue an amended writ of maritime attachment for an amount up to US$662,338.89.

WHEREFORE, Plaintiffs respectfully request that the application for an amended writ of maritime attachment and garnishment be granted.

_____
Michael J. Frevola

Sworn to before me this
18th day of October, 2007

_____
Notary Public

DIALYZ E. MORALES
Notary Public, State Of New York
No. 01MO6059215
Qualified In New York County
Commission Expires June 25, 200𝑈